

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 20-mj-411(KMM)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	JOINT MOTION OF THE PARTIES
)	FOR EXTENSION OF TIME FOR
)	FILING INDICTMENT
BRYCE MICHAEL WILLIAMS,)	
)	
Defendant.)	

The United States of America by and through its attorneys, Erica H. MacDonald, United States Attorney for the District of Minnesota, and Assistant United States Attorneys David P. Steinkamp and Harry Jacobs, together with Defendant Bryce Michael Williams and his attorneys, Ian and Andy Birrell, jointly move the Court pursuant to 18 U.S.C. §3161(h)(7) for a 60-day extension of time for filing the indictment in the above-captioned matter. The grounds for this motion are as follows:

1. On June 16, 2020, Defendant was arrested on a federal complaint. An initial appearance in the matter was held the next day, June 17, 2020, in the United States District Court for the District of Minnesota. On June 19, 2020, the Defendant was released on conditions of pre-trial release.

2. Pursuant to 18 U.S.C. §§ 3161(b) and 3161(h)(1)(F), an indictment is required to be filed by July 17, 2020.

4. The parties agree that a 60-day extension of the time period in which the United States is required to bring the matter before the grand jury serves the interests of Defendant, the public, and justice in this case, and that such interests outweigh the public and Defendant's

interests in a speedy trial. Specifically, the Government and Defendant have a mutual interest in discussing a pre-indictment plea agreement in this case. Due to multiple unique circumstances present here, the parties agree that a pre-indictment resolution would save the Government substantial resources while allowing Defendant to promptly resolve this matter and reduce his potential consequences.

5. Counsel for Defendant has consulted with Defendant about this extension request, and Defendant consents to the request and agrees that any period of delay is excluded from the calculation of time under the Speedy Trial Act.

For the foregoing reasons, the parties respectfully and jointly request that the motion for a 60-day extension of time for filing the indictment in the above-captioned matter be granted until August 29, 2020. A proposed order accompanies this motion.

Respectfully submitted,

Dated: June 29, 2020

ERICA H. MacDONALD
United States Attorney

/s/ David P. Steinkamp
BY: DAVID P. STEINKAMP
Assistant United States Attorney

/s/ Harry Jacobs
BY: HARRY JACOBS
Assistant United States Attorney

Dated: June 29, 2020

Bryce Michael Williams
BRYCE MICHAEL WILLIAMS, Defendant

Dated: June 29, 2020

Andy Birrell
ANDY BIRRELL, ESQ., Counsel for Defendant

Dated: June 29, 2020

Ian Birrell
IAN BIRRELL, ESQ., Counsel for Defendant